

Before the
FEDERAL COMMUNICATIONS COMMISSION
 Washington, DC 20554

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In the Matter of

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Amendment of Section 73.622(b)
 the Commission's Rules, DTV
 Table of Allotments
 (Sacramento, California)

MM Docket No. _____
 RM No. _____

To: The Chief, Allocations Branch

REPLY TO OPPOSITION

San Mateo County Community College District (the "District"), by its attorneys, hereby submits this Reply to the Opposition ("Opposition") filed by La Dov Educational Outreach, Inc. ("La Dov") in response to the District's Motion ("Motion") to dismiss a Petition for Rulemaking ("Petition") filed by La Dov on July 14, 2000, as supplemented on April 18, 2001, and June 19, 2001, to amend the Digital Television Table of Allotments, 47 C.F.R. § 73.622(b), by allotting DTV Channel *43 at Sacramento, California. In the Motion, the District contended that La Dov's Petition is defective because the allotment requested therein would cause impermissible interference to nearby DTV Station KHSL-DT, Channel 43, Chico, California. In addition, the District's motion noted that La Dov's Petition potentially blocks the District's proposal to substitute in-core DTV Channel *43 for its assigned out-of-core DTV Channel *59.¹

In its Opposition, La Dov explains that its June 19 Supplement specified a different antenna model in order to minimize predicted interference to KHSL-DT and claims that use of the new antenna model will reduce predicted interference to KHSL-DT below the two percent *de*

¹ The District's Petition for Rulemaking to substitute DTV Channel *43 for DTV Channel *59 was filed on October 9, 2001. See RM 10339.

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minimis level. La Dov's Reply also notes that the District has stated its willingness to accept the 2.2 percent interference that would be caused by La Dov's proposed operation to the District's proposed operation on Channel *43 at San Mateo, California. Based on the foregoing, La Dov urges the Commission to expeditiously adopt the two separate rulemaking proceedings requested by La Dov and the District.

As explained in the attached Engineering Statement of Hammett & Edison, Inc., La Dov's June 19 Supplement was not available on the Commission's Electronic Comment Filing System ("ECFS") when Hammett & Edison prepared the Engineering Statement submitted with the Motion.² Indeed, the June 19 Supplement only became available in the ECFS system after the filing of La Dov's Opposition on March 21, 2002, and then only as an attachment to that filing and not as a separate, stand-alone document. Nor has the Commission assigned rulemaking or docket numbers to the La Dov Petition or entered it into the Commission's engineering database.³ However, based on the antenna radiation pattern submitted with the June 19 Supplement, it appears that La Dov's modified proposal will adequately protect KHSL-DT.⁴ Moreover, the new radiation pattern will not increase the interference to the District's proposed operation on Channel *43 at San Mateo beyond the 2.2 percent which the District has already stated it is willing to accept.⁵ Finally, La Dov's modified proposal continues to cause less than two percent interference to the District's proposed operation on DTV Channel *43.⁶

² See Engineering Statement of Hammett & Edison, Inc. at 1 (April 2, 2002).

³ *Id.* at 1-2.

⁴ *Id.* at 2.

⁵ *Id.*; see Letter from Marilyn Lawrence to Magalie Roman Salas dated March 6, 2002 (attached to Motion).

⁶ Engineering Statement at 3. Although the attached Engineering Statement confirms that La Dov's modified proposal will cause less than two percent interference to KCSM-DT operating on Channel *43, the District calls to the attention of the Commission La Dov's stated willingness to accept, if necessary, a similar level of interference from the District's proposed facility. Opposition at 2.

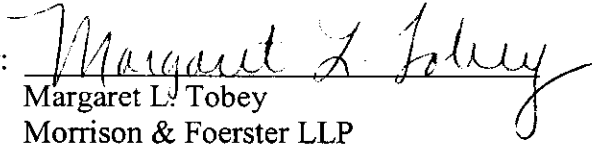
Accordingly, if the FCC's staff engineers confirm that La Dov's new radiation pattern will adequately protect KHSL-DT, the District concurs with La Dov's request that the Commission move expeditiously to adopt the required Notices of Proposed Rulemaking to (i) amend the DTV Table of Allotments to allot and assign DTV channel *43 to Sacramento, California, and (ii) amend the DTV Table of Allotments to allot and assign DTV channel *43 to San Mateo, California. Prompt action on the two rulemaking petitions will serve the public interest because, in the case of La Dov, such action will result in the introduction of a new noncommercial television service in Sacramento, California, and, in the case of the District, allow a noncommercial educational licensee with a long history of service to the public to avoid the unnecessary and unrecoverable expense associated with constructing an out-of-core facility on its assigned DTV Channel *59.

The Commission has previously recognized the special hardships faced by NCE licensees who have been assigned out-of-core DTV channels and has granted petitions to change such allotments to in-core channels in recognition of the "limited resources" of NCE licensees.⁷ The District's Petition for Rulemaking presents a clear opportunity for the Commission to avoid imposing an unnecessary financial burden on the District and the supporters of its Station KCSM. Accordingly, we urge the Commission to promptly adopt the two Notices of Proposed Rulemaking described herein and in La Dov's Opposition.

⁷ See *Amendment of Section 73.622(b), Table of Allotments, Digital Television Broadcast Stations*. (Evansville, Indiana), Report and Order, 16 FCC Rcd 2281 (2001) (permitting the substitution of an in-core DTV channel for an out-of-core DTV channel since it would allow the noncommercial licensee to "preserve its limited resources"); see also *Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service*, Memorandum Opinion and Order on Reconsideration of the Sixth Report and Order, 13 FCC Rcd 7418 (1998) (stating that the FCC "recognize[s] the additional burden placed on licensees with out-of-core DTV allotments" and agreeing that "the allotment of out-of-core channels may present a particular burden to noncommercial public television licensees because of their reliance on federal, state, and private contributions to raise funds").

Respectfully submitted,

SAN MATEO COMMUNITY COLLEGE DISTRICT

By: 
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2000 Pennsylvania Avenue, N.W.
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202-887-1500

April 2, 2002

**RM-10339
Station KCSM-DT
as DTV Channel 43
San Mateo, California**

**Engineering Exhibit
in Support of Response to
the La Dov Opposition to
Motion to Dismiss
Petition for Rulemaking**

April 2, 2002

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CONSULTING ENGINEERS
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**RM-10339 • Station KCSM-DT • as DTV Channel 43 • San Mateo, California
Engineering Exhibit in Support of Response to La Dov Opposition to
Motion to Dismiss Petition for Rulemaking**

Statement of Hammett & Edison, Inc., Consulting Engineers

The firm of Hammett & Edison, Inc., Consulting Engineers, has been retained on behalf of the San Mateo Community College District, licensee of non-commercial educational Station KCSM-TV, NTSC Channel 60, San Mateo, California, and permittee of Station KCSM-DT, DTV Channel 59, San Mateo, California, to prepare this engineering exhibit in support of a response to the March 21, 2002, La Dov Educational Outreach, Inc. *Opposition to Motion to Dismiss Petition for Rulemaking* ("Opposition").

Background Information

On October 9, 2001, the San Mateo Community College District ("SMCCD") filed a Petition for Rulemaking proposing to substitute in-core DTV Channel 43 for its presently allotted, out-of-core, DTV Channel 59. The Commission assigned rulemaking number RM-10339 to this proposal. The proposed reallocation of KCSM-DT from D59 to D43 was shown to protect all full-service NTSC stations, all DTV stations and allotments, and all Class A TV stations appearing in the Commission's engineering database at the time of the filing.

It was subsequently learned that on July 14, 2000, La Dov Educational Outreach, Inc. ("La Dov") had filed a Petition for Rulemaking to substitute DTV Channel 43 for unbuilt noncommercial educational NTSC Channel 52 at Sacramento, California. Use of NTSC Channel 52 at Sacramento is no longer possible due to the assignment of that channel to Station KICU-DT, DTV Channel 52, at San Jose, California. Unlike the SMCCD petition, which had been promptly assigned a RM number (RM-10339) and entered into the Commission's engineering database, the La Dov petition has yet to have an RM number assigned or to be entered into the Commission's engineering database (at least not in a manner that makes it routinely available to interested parties).

It was further learned that on April 18, 2001, La Dov filed a supplement to its petition, in response to FCC staff notification that use of DTV Channel 43 at Sacramento, with the facilities proposed by La Dov, would cause an impermissible 2.3% increase in interference to Station KHSL-DT, DTV Channel 43, at Chico, California. La Dov's supplement claimed that when its proposed Channel D43 facilities were re-studied using 1-kilometer by 1-kilometer cells (*i.e.*, 1 sq. km cells) and a terrain resolution of 10 points per kilometer, versus the default FCC values of 2-kilometer by 2-kilometer cells (*i.e.*, 4 sq. km cells) and a terrain resolution of 1 point per kilometer, the interference to KHSL-DT drops to 1.6%, which would be permissible under the Commission's 2% "*de minimis*" policy.



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As stated above, while the Commission staff has neither assigned a rulemaking number to the La Dov petition, nor entered the record into the Commission's engineering database in a manner so as to make it available to other interested parties, Commission staff have also not formally dismissed the La Dov petition. Further, Commission staff has now informally reported that the SMCCD petition for Channel D43 at San Mateo, (*i.e.*, RM-10339) is in apparent conflict with the La Dov petition for Channel D43 at Sacramento.

Finally, the La Dov Opposition discloses that there was a third filing by La Dov, on June 19, 2001, that substituted a different directional antenna ("DA") pattern in order to cure the excessive interference to KHSL-DT. Unlike the prior La Dov filings, which appear as separate documents in the Commission's Electronic Comment Filing System ("ECFS"), the June 19 La Dov filing does not appear separately in the ECFS, so there is no way that interested parties could have been aware of this third La Dov filing (the June 19, 2001 La Dov filing now appears in the ECFS, but only as an attachment to the March 21, 2002, La Dov filing).

Revised La Dov DA Pattern

The attached Figure 1 shows the revised DA pattern proposed in the June 19, 2001, La Dov filing, the originally proposed La Dov DA pattern, and the bearings from the proposed La Dov transmitting site to KHSL-DT and to the proposed KCSM-DT as DTV Channel 43 site, on the Sutro Tower in San Francisco. It can be seen that while this new DA pattern substantially reduces the radiation towards KHSL-DT, there is virtually no change in the radiation towards KCSM-DT as DTV Channel 43.

The attached Figure 2, an OET-69 interference study for the revised La Dov DTV Channel 43 proposal and also including the proposed KCSM-DT as DTV Channel 43 facilities, shows that indeed if the DA pattern proposed by La Dov is used the interference to the KHSL-DT allotment drops from an impermissible 2.1% to just 0.2%, thus meeting the Commission's "*de minimis*" criteria.* However, the interference to KCSM-DT as DTV Channel 43 remains unchanged, at 2.2%.

As shown by the attached OET-69 interference study for the proposed KCSM-DT as DTV Channel 43 facilities (which are unchanged from the facilities proposed in the initial October 9, 2001,

* The interference to the permitted KHSL-DT facilities still increases, by 0.4%, from 29.8% to 30.2%. Although this would normally be prohibited, because the interference is already over the 10% cap, the permitted KHSL-DT facilities of 129 kW ERP (DA) at 388 meters height above average terrain ("HAAT") and at the same location as the allotted KHSL-DT facilities, which are 1000 kW ERP (DA) at 396 meters HAAT, are clearly "checklist" facilities, and accordingly it is only the KHSL-DT allotment that must be protected.



**RM-10339 • Station KCSM-DT • as DTV Channel 43 • San Mateo, California
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SMCCD Petition for Rulemaking), and now reflecting the revised La Dov design for its proposed Sacramento DTV Channel 43 facilities, KCSM-DT as DTV Channel 43 would continue to cause $\leq 2\%$ interference to La Dov (namely, 1.6%), and the total La Dov interference would remain well below the 10% overall interference cap. Therefore, the conflict between the SMCCD and La Dov proposals for DTV Channel 43 continues to be excessive interference by the La Dov proposal to the SMCCD proposal, and not excessive interference by the SMCCD proposal to the La Dov proposal.

Re-Affirmation of Proposed Resolution of Apparent Conflict

SMCCD re-affirms its continued willingness to accept 2.2% of interference that the revised La Dov proposal for DTV Channel 43 at Sacramento would cause to the KCSM-DT as DTV Channel 43 proposal (that is, to accept more than 2% “*de minimis*” interference), in order to eliminate any conflict between the SMCCD and La Dov proposals, and to allow both petitions for rulemaking to move forward with dispatch. This solution would be in the public interest because it would allow a new noncommercial DTV service at Sacramento while also allowing SMCCD to build a single, in-core DTV facility, as opposed to having to build an out-of-core DTV facility on its presently allotted DTV Channel 59, which would then have to be abandoned at the end of the transition period.

Summary

The revised DA pattern proposed by La Dov cures the interference problem to KHSL-DT, DTV Channel 43, at Chico, California. The revised La Dov DTV Channel 43 facilities would continue to cause 2.2% interference to the KCSM-DT as DTV Channel 43 facilities proposed by SMCCD, but SMCCD re-affirms its willingness to accept an additional 0.2% of interference so as to eliminate any conflict between the two proposals. The KCSM-DT as DTV Channel 43 facilities proposed by SMCCD would continue to cause well below “*de minimis*” interference to the revised La Dov facilities. Therefore, I conclude that both Petitions for Rulemaking should be able to proceed and result in appropriate amendments to the DTV Table of Allotments.



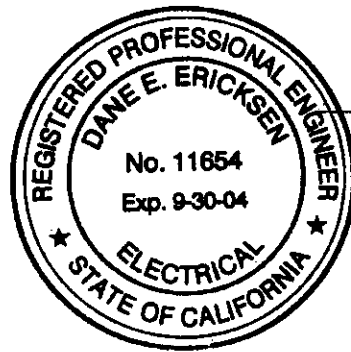
**RM-10339 • Station KCSM-DT • as DTV Channel 43 • San Mateo, California
Engineering Exhibit in Support of Response to La Dov Opposition to
Motion to Dismiss Petition for Rulemaking**

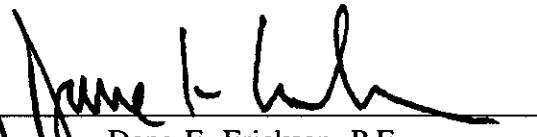
List of Figures

In carrying out these engineering studies, the following attached figures were prepared under my direct supervision:

1. Polar plot of revised La Dov directional antenna pattern versus previously proposed antenna pattern
2. OET-69 interference study for revised La Dov DTV Channel 43 proposal, including KCSM-DT as DTV Channel 43
3. OET-69 interference study for KCSM-DT as DTV Channel 43, including the revised La Dov DTV Channel 43 facilities.

April 2, 2002

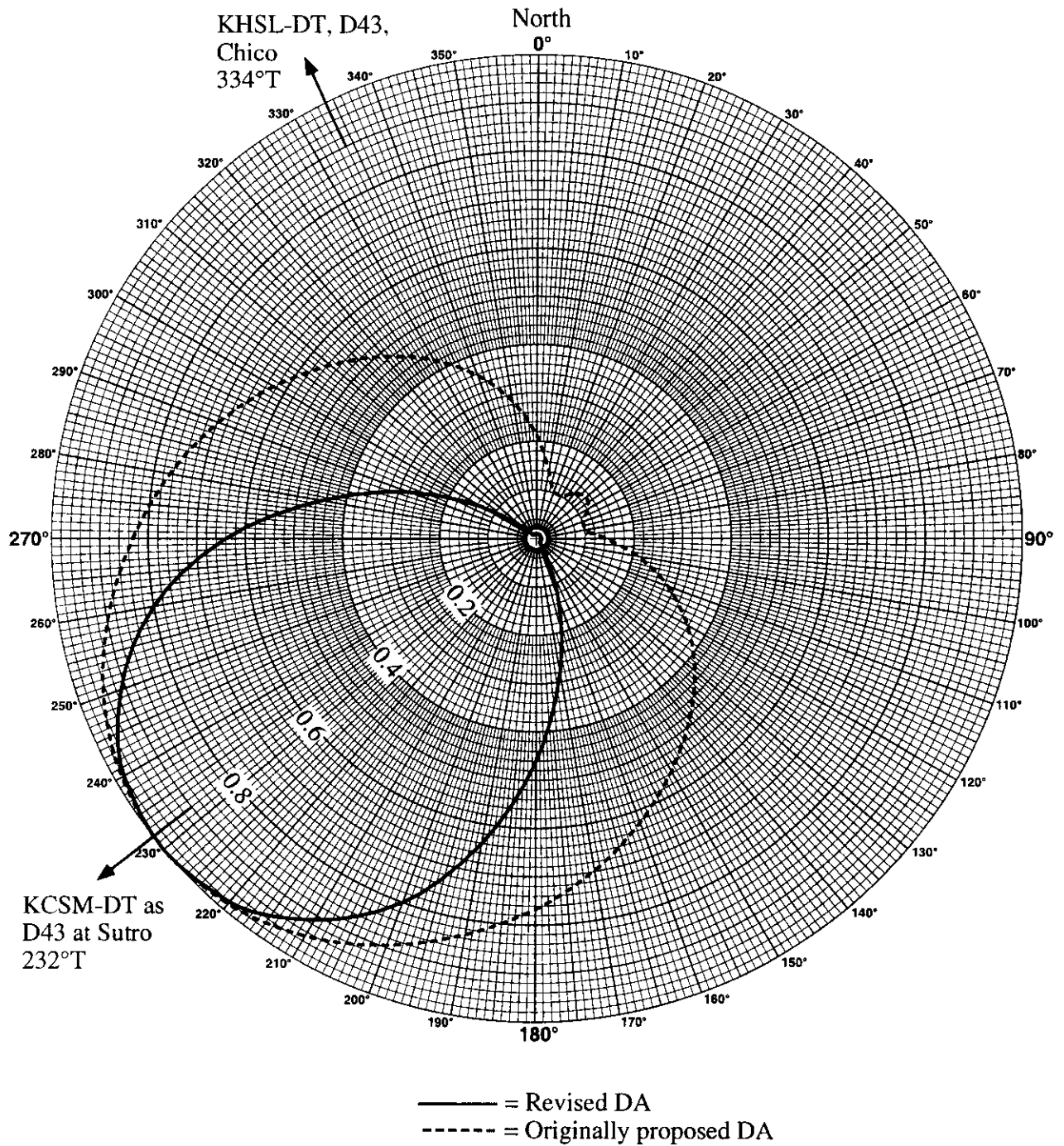



Dane E. Ericksen, P.E.



HAMMETT & EDISON, INC.
CONSULTING ENGINEERS
SAN FRANCISCO

Revised La Dov DA Pattern
- Relative Field -



Note: Revised La Dov DA pattern taken from
Exhibit C-1 of the June 19, 2001, La Dov filing.

**RM-10339 • Station KCSM-DT • as DTV Channel 43 • San Mateo, California
Engineering Exhibit in Support of Response to La Dov Opposition to
Motion to Dismiss Petition for Rulemaking**

**OET-69 Interference Study for Modified DTV Channel 43 Facilities
at Sacramento, California**

Interference analysis
tvixstudy 2.3.13

Before case parameters:
(same as "Original" below)

After case parameters:

	--Modified-----	--Original-----
Station:	D43 900312KG APP	N52 900312KG APP
City:	SACRAMENTO, CA	SACRAMENTO, CA
Coordinates:	N 38-37-49.0	N 38-14-48.0
	W 120-51-20.0	W 121-29-59.0
Height AMSL:	749.0 m	372.0 m
Maximum ERP:	100 kW	3310 kW
Azimuth pattern:	MC955158az.pat	BOG-18350_ODD90031
Orientation:	230.0	0.0
Elevation pattern:	OET-69 generic	OET-69 generic
Service level:	41.4 dBu	65.1 dBu

			Before		After			
			-----		-----			
Protected station			BasePop	IX Change		IX Change		%Chng
			1000s	1000s	%Base	1000s	%Base	

N42	KTNC-TV LIC	CONCORD, CA	7,811	337	4.3	337	4.3	0.0
N42	KTNC-TV CP	CONCORD, CA	8,306	316	3.8	316	3.8	0.0
N40	KTXL LIC	SACRAMENTO, CA	5,667	72	1.3	72	1.3	0.0
N44	KBHK-TV LIC	SAN FRANCISCO, CA	5,943	52	0.9	52	0.9	0.0
N29	KSPX LIC	SACRAMENTO, CA	1,589	70	4.4	70	4.4	0.0
N43	KGMC LIC	CLOVIS, CA	934	0	0.0	0	0.0	0.0
N43	KGMC CP	CLOVIS, CA	973	0	0.0	0	0.0	0.0
D43	KHSL-DT CP	CHICO, CA	570	170	29.8	172	30.2	0.4
D43	KHSLDT allot	CHICO, CA	570	7	1.2	8	1.4	0.2
D44	KRXI-DT CP	RENO, NV	392	29	7.4	29	7.4	0.0
D44	KRXIDT allot	RENO, NV	392	1	0.3	1	0.3	0.0
D43	KCSM-DT CP*	SAN MATEO, CA	4,746	-696	-14.7	-592	-12.5	2.2

* Station parameters modified

Modified station parameters:

	--Modified-----	--Original-----
Station:	D43 KCSM-TV CP	D59 KCSM-TV CP
City:	SAN MATEO, CA	SAN MATEO, CA
Coordinates:	N 37-45-19.0	N 37-41-07.0
	W 122-27-06.0	W 122-26-01.0
Height AMSL:	477.0 m	448.7 m
Maximum ERP:	1000 kW	317 kW
Azimuth pattern:	kbhkD45az.pat	TCI-28812_888
Orientation:	0.0	0.0
Elevation pattern:	OET-69 generic	OET-69 generic
Service level:	41.4 dBu	42.6 dBu



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Figure 2A

**RM-10339 • Station KCSM-DT • as DTV Channel 43 • San Mateo, California
Engineering Exhibit in Support of Response to La Dov Opposition to
Motion to Dismiss Petition for Rulemaking**

**OET-69 Interference Study for Modified DTV Channel 43 Facilities
at Sacramento, California**

Modified station parameters:

	--Modified-----	--Original-----
Station:	D10 KSBWDT allot	D43 KSBWDT allot
City:	SALINAS, CA	SALINAS, CA
Coordinates:	N 36-45-23.0	N 37-03-30.0
	W 121-30-05.0	W 121-46-33.0
Height AMSL:	1027.0 m	1227.0 m
Maximum ERP:	16.5 kW	449 kW
Azimuth pattern:	omnidirectional	DTV0178 (replication)
Orientation:		0.0
Elevation pattern:	OET-69 generic	OET-69 generic
Service level:	36.0 dBu	41.4 dBu

Note: The results of the OET-69 algorithm are dependent on the use of computer databases, including terrain, population, and FCC engineering records. FCC Rules Section 0.434(e) specifically disclaims the accuracy of its databases, recommending the use of primary data sources (i.e., paper documents), which is not practical for DTV interference analyses. Further, while Hammett & Edison, Inc. endeavors to follow official releases and established precedents on the matter, FCC policy on DTV analysis methods is constantly changing. Thus, the results of OET-69 interference and coverage studies are subject to change and may differ from FCC results.



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Figure 2B

**RM-10339 • Station KCSM-DT • as DTV Channel 43 • San Mateo, California
Engineering Exhibit in Support of Response to La Dov Opposition to
Motion to Dismiss Petition for Rulemaking**

**OET-69 Interference Study for KCSM-DT as DTV Channel 43,
Reflecting the Revised La Dov Proposal for DTV Channel 43 at Sacramento**

Interference analysis
tvixstudy 2.3.13

Before case parameters:
(same as "Original" below)

After case parameters:

	--Modified-----	--Original-----
Station:	D43 KCSM-TV CP	D59 KCSM-TV CP
City:	SAN MATEO, CA	SAN MATEO, CA
Coordinates:	N 37-45-19.0	N 37-41-07.0
	W 122-27-06.0	W 122-26-01.0
Height AMSL:	477.0 m	448.7 m
Maximum ERP:	1000 kW	317 kW
Azimuth pattern:	kbhkD45az.pat	TCI-28812_888
Orientation:	0.0	0.0
Elevation pattern:	OET-69 generic	OET-69 generic
Service level:	41.4 dBu	42.6 dBu

++Warning - some records had missing or bad data:

D43 900312KG APP No corresponding DTV allotment, re-computed baseline population

			Before		After		
		BasePop	IX Change		IX Change		
		1000s	1000s	%Base	1000s	%Base	%Chng
Protected station							
N42 KTNC-TV LIC	CONCORD, CA	7,811	335	4.3	337	4.3	0.0
N42 KTNC-TV CP	CONCORD, CA	8,306	304	3.7	316	3.8	0.1
N40 KTXL LIC	SACRAMENTO, CA	5,667	72	1.3	72	1.3	0.0
N36 KICU-TV LIC	SAN JOSE, CA	6,422	125	1.9	125	1.9	0.0
N44 KBHK-TV LIC	SAN FRANCISCO, CA	5,943	52	0.9	52	0.9	0.0
D43 900312KG APP*	SACRAMENTO, CA	1,570	0	0.0	10	0.6	0.6
N43 KGMC LIC	CLOVIS, CA	934	0	0.0	0	0.0	0.0
N43 KGMC CP	CLOVIS, CA	973	0	0.0	0	0.0	0.0
D43 KHSL-DT CP	CHICO, CA	570	170	29.8	170	29.8	0.0
D43 KHSLDT allot	CHICO, CA	570	-2	-0.4	7	1.2	1.6

* Station parameters modified

[continued on next page]

**RM-10339 • Station KCSM-DT • as DTV Channel 43 • San Mateo, California
Engineering Exhibit in Support of Response to La Dov Opposition to
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**OET-69 Interference Study for KCSM-DT as DTV Channel 43,
Reflecting the Revised La Dov Proposal for DTV Channel 43 at Sacramento**

Modified station parameters:

	--Modified-----	--Original-----
Station:	D43 900312KG APP	N52 900312KG APP
City:	SACRAMENTO, CA	SACRAMENTO, CA
Coordinates:	N 38-37-49.0	N 38-14-48.0
	W 120-51-20.0	W 121-29-59.0
Height AMSL:	749.0 m	372.0 m
Maximum ERP:	100 kW	3310 kW
Azimuth pattern:	MC955158az.pat	BOG-18350_ODD90031
Orientation:	230.0	0.0
Elevation pattern:	OET-69 generic	OET-69 generic
Service level:	41.4 dBu	65.1 dBu

Modified station parameters:

	--Modified-----	--Original-----
Station:	D10 KSBWDT allot	D43 KSBWDT allot
City:	SALINAS, CA	SALINAS, CA
Coordinates:	N 36-45-23.0	N 37-03-30.0
	W 121-30-05.0	W 121-46-33.0
Height AMSL:	1027.0 m	1227.0 m
Maximum ERP:	16.5 kW	449 kW
Azimuth pattern:	omnidirectional	DTV0178 (replication)
Orientation:		0.0
Elevation pattern:	OET-69 generic	OET-69 generic
Service level:	36.0 dBu	41.4 dBu

Note: The results of the OET-69 algorithm are dependent on the use of computer databases, including terrain, population, and FCC engineering records. FCC Rules Section 0.434(e) specifically disclaims the accuracy of its databases, recommending the use of primary data sources (i.e., paper documents), which is not practical for DTV interference analyses. Further, while Hammett & Edison, Inc. endeavors to follow official releases and established precedents on the matter, FCC policy on DTV analysis methods is constantly changing. Thus, the results of OET-69 interference and coverage studies are subject to change and may differ from FCC results.



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Figure 3B

CERTIFICATE OF SERVICE

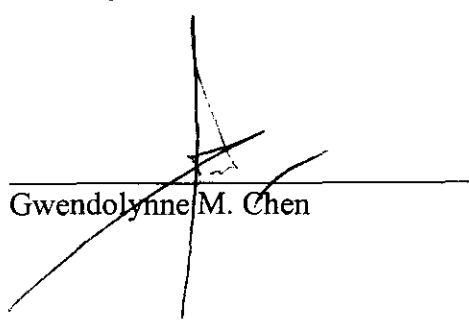
I, Gwendolynne M. Chen, a legal assistant in the law offices of Morrison & Foerster LLP, do hereby certify that I have, on this 2d day of April, 2002, caused copies of the foregoing "REPLY TO OPPOSITION" sent via U.S. mail, postage prepaid, to the following:

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Mass Media Bureau
Federal Communications Commission
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Gwendolynne M. Chen

* By electronic mail.